October 2, 2002

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: MM Docket No. 99-325
Presentation of National Public Radio, Inc.
***Ex Parte* Notice**

Dear Ms. Dortch:

Pursuant to Section 1.1200, et seq., of the Commission's Rules, National Public Radio, Inc. ("NPR") hereby notifies the Commission of the following *ex parte* presentation by NPR.

On October 1, 2002, Michael Starling, NPR Vice President for Engineering, and Michelle Shanahan, NPR Associate General Counsel, met with Susan Eid, Legal Advisor to FCC Chairman Michael Powell, to discuss the above-referenced proceeding. NPR discussed its support for adoption of the iBiquity IBOC FM system, subject to an FCC commitment to affording FM broadcasters an opportunity to offer secondary audio program services and subject to resolution of interference concerns, as set forth in NPR's Comments. NPR further discussed its support for adoption of the iBiquity IBOC AM system for daytime service, and the expeditious development and testing of an acceptable IBOC AM nighttime service, as set forth in NPR's Comments. NPR reported on its discussions with radio manufacturers regarding multi-channel digital broadcasting, and described a pilot project that would enable NPR member stations and radio manufacturers to test multi-channel digital broadcasting at local stations. NPR presented the attached description of the pilot project.

If you have any questions, please contact me at (202) 513-2055.

Sincerely,

Michelle M. Shanahan
Associate General Counsel

cc: Susan M. Eid

NPR HD Radio Pilot Project

Once the FCC adopts an IBOC standard for FM and daytime AM digital radio broadcast, we expect many broadcasters, including many noncommercial broadcasters, will expend considerable resources to add a digital broadcast. In our discussions with our Member stations, a consensus has emerged: **the return on this investment for public radio is to expand the content that is offered to the American public**. As a consequence, NPR has initiated conversations with several sectors of the broadcast and consumer electronics industry regarding multi-channel broadcasting with HD Radio (or IBOC digital radio technology).

Multi-channel broadcasting could enable member stations to provide distinct content on two or more channels within the hybrid IBOC-FM digital radio signal. To this end, NPR is working to establish a pilot project that would enable stations and manufacturers to observe and evaluate the potential for multi-channel digital broadcasting at local stations.

What is the pilot project?

This project would place member stations of varying technical configurations on the air experimentally to test multi-channel functionality. The pilot stations would receive IBOC digital radio exciters capable of generating lower-grade voice channels as a second stream. NPR is in the process of contacting exciter manufacturers to seek the loan of equipment for this test. There may also be an option to digitize an existing analog subcarrier using high- speed data modulation to generate a third or fourth lower-grade voice channel.

Pilot project stations would have the opportunity to experiment with content for multi-channel broadcasting. As an example, a public station could provide a digital simulcast of its main analog program channel (i.e. Jazz, Classical) and a second digital voice channel for full time news and information. Additional channels could be provided on FM subcarriers to fix-tuned receivers. For example, WXPN-FM in Philadelphia currently offers two foreign language subcarrier channels in Greek and Italian. NPR would work with the pilot station to provide the content for the second channel.

Pilot project stations would receive prototype digital radio receivers to evaluate the functionality of the multi-channel services. We anticipate that the test would be of short duration, in the range of 30 to 90 days, but the length of testing could be influenced by FCC decisions and by the willingness of exciter and receiver manufacturers to loan test equipment.

NPR will work with all parties to establish evaluative criteria, both from a technical and a listener satisfaction standpoint. We anticipate the project would be tested through a

combination of technical self evaluation and subjective impressions from listeners via focus groups.

What progress has been made to date?

Thus far, we have made contact with radio equipment manufacturers, integrated circuit developers, radio receiver manufacturers, automakers and high-speed datacasting proponents regarding multi-channel functionality. We believe that it is in the best interest of NPR and member stations to begin multi-site on-air demonstrations of HD Radio multicasting and several companies have agreed to work with public radio to do this.

To set up the pilot demonstrations, member stations in several strategic markets are being contacted.

Other pre-standard testing

Additionally, the Radio Advisory Group to the CPB Digital Panel, the group that considers radio/TV allocation of congressionally appropriated digital conversion funding, has recommended pre-standard testing of AM HD Radio. A Request for Information (RFI) from broadcast consulting firms is being prepared to address the special implications of converting AM stations to HD Radio. AM test stations will also be needed for on-air evaluation.

NPR believes that advance testing and evaluation of HD Radio technology will assure wise investment of digital conversion dollars and enable stations to make informed decisions regarding early adoption. NPR has analyzed the costs for converting public stations in the identified "seed markets." Pre-standard testing and pilot demonstration projects will enhance our ability to exploit the use of digital radio transmission and strengthen public radio's position for future allocations of digital conversion funding.